

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

[1] BLACK EMERGENCY RESPONSE TEAM, et al.)  
  )  
  )  
Plaintiffs,  )  
v.  )  
  )  
  )     Case No. CIV-21-1022-G  
[1] GENTNER DRUMMOND, in his official capacity )  
as Oklahoma Attorney General, et al.              )  
  )  
Defendants.  )

**UNIVERSITY AND STATE DEFENDANTS' UNOPPOSED MOTION  
TO EXTEND SUBMISSION DEADLINE**

COME NOW Defendants John R. "Rick" Braught, Robert Ross, Natalie Shirley, Eric Stevenson, Kenneth S. Waits, Anita Holloway and Rick Nagel (University Defendants), in their official capacities, as well as Defendants Gentner Drummond, Ryan Walters, Zachary Archer, Donald Burdick, Sarah Lepak, Katie Quebedeaux, Kendra Wesson, Kevin Stitt, Jack Sherry, Dennis Casey, Steven Taylor, Courtney Warmington, P. Mitchell Adwon, Jeffrey Hickman, Dustin Hilliary, Ken Levit, and Michael Turpen (State Defendants), in their official capacities, and respectfully request this Honorable Court extend the deadline to submit responses to the requests in the Court's order issued on June 14, 2024 [Doc. 174]. In support of their motion, these Defendants state as follows:

1.     No other parties oppose this extension.
2.     Lead Counsel for University Defendants has a pre-planned travel commitment from June 19-21, 2024, and both counsel for University Defendants will be attending an out-of-state conference from June 25-28, 2024. These travel commitments

pose significant challenges for timely conference with University Defendants and the other parties in the matter in advance of the June 28, 2024, deadline.

3. Counsel for State Defendants have an expedited TRO/injunction response due on June 18, 2024, in the Eastern District of New York in *Inter Insurance Agency Services Ltd. v. Insurance Department of the State of Oklahoma*, No. 24-cv-3720 LGD (E.D.N.Y). They also have a response due to a plaintiff's motion for partial summary judgment on June 24, 2024, in a case concerning the proper use of billions of dollars of state retirement funds. *Keenan v. Russ*, CV-2023-3021 (Okla. Cnty. 2024). Finally, they have an important discovery deadline on July 1, 2024, in *Caremark, LLC v. Drummond*, No. 5:24-cv-62-HE (W.D. Okla.).

4. No hearings or conflicting deadlines have been set in this case, so an extension will not adversely impact scheduling in this matter.

As noted, Plaintiffs have informed Defendants that they do not oppose an extension until July 12, 2024. Accordingly, State and University Defendants respectfully request that this Court extend Defendants' time to respond to the Court's requests until July 12, 2024.

Respectfully submitted,

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s/ Zach West

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of June 2024, I transmitted the attached document to the Clerk of Court using the ECF system for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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